

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

GLOBAL NAPS, INC.,  
Plaintiff,

v.

VERIZON NEW ENGLAND, INC., et al.  
Defendants.

Civil Action No. 02-12489-RWZ

Civil Action No. 05-10079-RWZ

GLOBAL NAPS, INC.'S REPLY TO  
VERIZON NEW ENGLAND, INC.'S COUNTERCLAIM

Global NAPS, Inc. ("Global") replies to Verizon New England, Inc. ("Verizon")'s counterclaim as follows:

1. This paragraph describes Verizon's counterclaim and as such does not require a reply.
2. Admitted.
3. Admitted.
4. Admitted.
5. Denied.
6. Admitted.
7. Admitted.
8. Admitted.
9. Admitted.
10. Admitted.
11. Admitted.
12. The Order speaks for itself.

- 13. The Agreement speaks for itself.
- 14. The Agreement speaks for itself.
- 15. The Agreement speaks for itself.
- 16. The Agreement speaks for itself.
- 17. Denied.
- 18. Denied.

Count I

- 19. This paragraph does not require a reply.
- 20. Denied.
- 21. Global admits Verizon demanded payment, but denies any additional payment was due.
- 22. Denied.
- 23. Denied.
- 24. Denied.

Count II

- 25. Paragraph 25 does not require an answer.
- 26. Admitted.
- 27. Admitted.

Affirmative Defenses

The counterclaim should be dismissed for failure to state a claim on which relief can be granted.

Global NAPS, Inc. hereby demands a trial by jury of all issues triable to a jury.

DATED: June 9, 2006

Respectfully submitted,  
**GLOBAL NAPS, INC.**

By:

/s/ Andrew Good

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Certificate of Service

The undersigned certifies that he has caused the foregoing to be served electronically and by first-class mail, postage prepaid, this date upon the following:

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Dated: June 9, 2006

/s/ Andrew Good